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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MAXIMILIAN KLEIN, et al., on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC., a Delaware
Corporation headquartered in California,

Defendant.

Case No. 3:20-cv-08570-JD

**DECLARATION OF AMRISH
ACHARYA IN SUPPORT OF OMNIBUS
MOTION TO SEAL MATERIALS
SUBMITTED IN CONNECTION WITH
CLASS CERTIFICATION AND
DAUBERT BRIEFING AND MERITS
EXPERT PROFFERS IN THE
ADVERTISER CASE**

Judge: Hon. James Donato

No. 3:20-cv-08570-JD

DECLARATION OF AMRISH ACHARYA ISO
OMNIBUS MOTION TO SEAL MATERIALS
SUBMITTED IN CONNECTION WITH CLASS
CERTIFICATION AND DAUBERT BRIEFING &
ADVERTISER MERITS EXPERT PROFFERS

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3 1. I, Amrish Acharya, declare as follows:

4 2. I am a Director of Finance at Meta Platforms, Inc. I have been employed by Meta
5 since 2015 and have held my current title since 2021. Over the course of my employment at Meta,
6 I have acquired personal knowledge of Meta's practices and procedures concerning the
7 maintenance of the confidentiality of its strategic, business, financial, technical, and marketing
8 information.

9 3. I respectfully submit this declaration in support of the Omnibus Motion to Seal
10 Materials Submitted in Connection with the Class Certification and *Daubert* Briefing in the
11 Advertiser case ("Sealing Motion"), filed on August 14, 2024 in *Klein v. Meta Platforms, Inc.*,
12 Case No. 3:20-cv-08570-JD (N.D. Cal.).

13 4. The facts set forth in this declaration are true and correct to the best of my
14 knowledge, information, and belief, and are based on my personal knowledge of Meta's policies
15 and practices as they relate to the treatment of confidential information, materials that were
16 provided to me and reviewed by me, or conversations with other knowledgeable employees of
17 Meta. If called upon as a witness in this action, I could and would testify from my personal
18 knowledge and knowledge acquired from sources with factual foundation.

19 5. All the material for which Meta requests sealing is maintained as highly
20 confidential. To the best of my knowledge, none of this material has been publicly disclosed. As
21 demonstrated with factual particularity below, there are compelling reasons and good cause to seal
22 Meta's highly confidential materials.

23 6. For the reasons stated below, this information is highly sensitive, and if publicly
24 disclosed, could significantly prejudice Meta's competitive position by harming Meta's
25 relationships with business partners, developers, and advertisers, putting Meta at unfair
26 disadvantage in future business negotiations, and permitting Meta's competitors to gain an unfair
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1 advantage in competition with Meta. For example, the public disclosure of Meta's internal,
2 confidential material could reveal Meta's strategic decision-making and influence the business
3 strategies employed by Meta's competitors by enabling them to mimic Meta's confidential
4 strategies in an effort to attract users or advertisers away from Meta. The disclosure of Meta's
5 confidential material might also give a competitor or a potential business partner unfair leverage
6 in competing against or negotiating with Meta.

7 7. As a matter of internal policy, Meta and its employees treat as strictly confidential:
8 (1) nonpublic business dealings with third parties, including details of negotiation strategies or
9 specific deal terms; (2) nonpublic financial data or information; (3) nonpublic pricing data or
10 information; (4) nonpublic technical functionality of Meta's products and systems; (5) internal
11 research or analyses, including proprietary methods for conducting that research or analysis; (6)
12 nonpublic business strategies, including internal analyses or discussions of in-development or
13 unreleased products, features, or future plans; and (7) other sensitive information that, if publicly
14 disclosed, could prejudice Meta's business interests. In my experience and to the best of my
15 knowledge, Meta does not disclose internal documents, data, or information of this nature outside
16 of the company, except to authorized third parties when so required or permitted by law or contract.

17 8. The specific information Meta seeks to seal is identified in the tables below, with
18 numbered rows for the Court's ease of reference:
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Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
1	795-01	7:2-4, between “in late 2018” and “—e.g.,”	This text details the strategy and proprietary sources and methods for gathering market research. This information contains nonpublic and confidential research regarding app performance data and competitive analysis, including proprietary methods for obtaining that data or conducting that research, and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta’s product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta’s competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta’s product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta’s competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
2	795-01	7:5, after “exploit—” through end of sentence	This text details the strategy and proprietary sources and methods for gathering market research. This information contains nonpublic and confidential research regarding app performance data and competitive analysis, including proprietary methods for obtaining that data or conducting that research, and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta’s product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta’s competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta’s product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta’s competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
3	795-01	n. 13, parenthetical after “See Ex. 6 (PX 2989) at 435-36”	This text details the strategy and proprietary sources and methods for gathering market research. This information contains nonpublic and confidential research regarding app performance data and competitive analysis, including proprietary methods for obtaining that data or conducting that research, and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta’s product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta’s competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta.
4	795-01	7:18-8:1, between “with Ticketmaster as” and “and a May 30, 2017”	This text contains confidential, non-public information regarding a non-party developer and business partner and implicates its confidentiality interests by revealing commercially sensitive information about its business strategies disclosed in confidential contract negotiations with Meta that it has a reasonable expectation Meta will maintain the confidentiality of. It also describes the negotiation of specific contract terms between Meta and that non-party business partner. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta’s competitors could use this non-party information to unfairly target Meta’s business partners.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
5	795-01	8:2, after “restricting Ticketmaster from” through end of line	This text contains confidential, non-public information regarding a non-party developer and business partner and implicates its confidentiality interests by revealing contractual terms that it has a reasonable expectation Meta will maintain the confidentiality of. It also quotes specific contract terms between Meta and that non-party business partner. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals confidential contract terms, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta’s competitors could use this non-party information to unfairly target Meta’s business partners.
6	795-01	8:4-8:7, between “restricting Apple from” and “and a July 12, 2017”	This text contains confidential, non-public information regarding a non-party developer and business partner and implicates its confidentiality interests by revealing contractual terms that it has a reasonable expectation Meta will maintain the confidentiality of. It also quotes specific contract terms between Meta and that non-party business partner. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals confidential contract terms, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta’s competitors could use this non-party information to unfairly target Meta’s business partners.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
7	795-01	8:8-8:9, after “Apple and Meta” through end of line	This text contains confidential, non-public information regarding a non-party developer and business partner and implicates its confidentiality interests by revealing contractual terms that it has a reasonable expectation Meta will maintain the confidentiality of. It also quotes specific contract terms between Meta and that non-party business partner. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals confidential contract terms, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta’s competitors could use this non-party information to unfairly target Meta’s business partners.
8	795-01	n. 27, between “showing” and “budget reduction”	This text describes confidential financial information and data, and sensitive product strategy discussions. This information reflects and is calculated from internal, nonpublic Meta financial data. Meta spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Meta competitive harm by giving competitors insight into confidential Meta financial information. Further, this information reflects sensitive, highly confidential characterizations by Meta’s internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Meta to gain an unfair advantage against Meta.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
9	795-01	n. 27, between “content, with a” and “and an additional”	This text describes confidential financial information and data, and sensitive product strategy discussions. This information reflects and is calculated from internal, nonpublic Meta financial data. Meta spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Meta competitive harm by giving competitors insight into confidential Meta financial information. Further, this information reflects sensitive, highly confidential characterizations by Meta’s internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Meta to gain an unfair advantage against Meta.
10	795-01	n. 27, after “and an additional” through end of footnote	This text describes confidential financial information and data, and sensitive product strategy discussions. This information reflects and is calculated from internal, nonpublic Meta financial data. Meta spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Meta competitive harm by giving competitors insight into confidential Meta financial information. Further, this information reflects sensitive, highly confidential characterizations by Meta’s internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Meta to gain an unfair advantage against Meta.

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11	795-01	10:1-3, between “in 2018, Netflix” and “that after”	This text contains non-public and confidential information regarding Meta’s agreements with an advertiser. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give an advertiser unfair leverage in competing against or negotiating with Meta. Moreover, Meta’s competitors could use this non-party information to unfairly target Meta’s advertisers and offer specific deal terms designed to undercut those offered by Meta. It also contains non-public, confidential information about the advertising spend of a particular advertiser, which that advertiser has a reasonable expectation Meta will maintain the confidentiality of.
12	795-01	n. 34, parenthetical after “S. Wang Dep. Tr.”	This text contains confidential, non-public information regarding Meta’s internal business strategies and analyses, including summaries and discussions of Meta’s internal modeling and assessments of its products and infrastructure that reveal competitively sensitive information, including potential improvements or other product changes.
13	795-01	n. 35, parenthetical after “PALM-013460551”	This information describes Meta’s internal assessment and considerations regarding the negotiation of a contract between Meta and Google. This text contains non-public and confidential information regarding Meta’s agreements with a business partner as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give an ad venue unfair leverage in competing against or negotiating with Meta. Moreover, Meta’s competitors could use this non-party information to unfairly target Meta’s business partners and offer specific deal terms designed to undercut those offered by Meta.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
14	795-01	n. 35, parenthetical after "PX 1711 at 349"	This information describes Meta's internal assessment and considerations regarding the negotiation of a contract between Meta and Google. This text contains non-public and confidential information regarding Meta's agreements with a business partner as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give an ad venue unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's business partners and offer specific deal terms designed to undercut those offered by Meta.
15	795-01	n. 38, parenthetical after "see also PX 1710"	This text describes technical aspects of Meta's advertising products. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's Audience Network product. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.
16	795-01	n. 38, parenthetical after "S. Wang Dep. Tr. 207:23-208:3"	This text describes technical aspects of Meta's advertising products. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's Audience Network product. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.
17	795-01	n. 38, parenthetical after "221:18-24"	This text describes technical aspects of Meta's advertising products. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's Audience Network product. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
18	795-03	Page PALM-012863800, between “everything we collected is still there” and “Per App/Dataset Info”	This text describes proprietary sources and methods for gathering market research. This information contains nonpublic and confidential data or research regarding app performance data, including proprietary methods for obtaining that data or conducting that research. This information has never been disclosed publicly and Meta’s product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta’s competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta.
19	795-03	Page PALM-012863800, between “video_type (ad or content)” and “Snapchat”	This text describes proprietary sources and methods for gathering market research. This information contains nonpublic and confidential data or research regarding app performance data, including proprietary methods for obtaining that data or conducting that research. This information has never been disclosed publicly and Meta’s product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta’s competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
20	795-03	Top of page PALM-012863801 until “We used it to measure”	This text describes proprietary sources and methods for gathering market research. This information contains nonpublic and confidential data or research regarding app performance data, including proprietary methods for obtaining that data or conducting that research. This information has never been disclosed publicly and Meta’s product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta’s competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta.
21	795-03	Page PALM-012863801, between “MS team and others” and “Summary of types of analyses conducted”	This text describes proprietary sources and methods for gathering market research. This information contains nonpublic and confidential data or research regarding app performance data, including proprietary methods for obtaining that data or conducting that research. This information has never been disclosed publicly and Meta’s product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta’s competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
22	795-04	Body of email sent at 8:33 AM	This text describes proprietary sources and methods for gathering market research. This information contains nonpublic and confidential data or research regarding app performance data, including proprietary methods for obtaining that data or conducting that research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta.
23	795-04	Email addresses of Meta employees as highlighted in exhibit	This text reveals email addresses of current or former employees of Meta. These current or former employees have a legitimate, legally recognized privacy interest in protecting their contact information from public disclosure. If their contact information were to be publicly disclosed, they may be subject to repeated inquiries from the press or members of the general public, which could rise to the level of threats or harassment, given the current media attention on Meta.
24	795-05	Email addresses of Meta employees as highlighted in exhibit	This text reveals email addresses of current or former employees of Meta. These current or former employees have a legitimate, legally recognized privacy interest in protecting their contact information from public disclosure. If their contact information were to be publicly disclosed, they may be subject to repeated inquiries from the press or members of the general public, which could rise to the level of threats or harassment, given the current media attention on Meta.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
25	795-06	Page PALM-004966275, all rows with the exception of “FB Inc. Snap S-1 analyses” row, as highlighted in exhibit	This document contains nonpublic and confidential data or research regarding internal user data, including proprietary methods for obtaining that data or conducting that research. This information has never been disclosed publicly and Meta’s product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta’s competitors, for example by influencing how those competitors conduct market research.
26	795-06	Email addresses of Meta employees as highlighted in exhibit	This text reveals email addresses of current or former employees of Meta. These current or former employees have a legitimate, legally recognized privacy interest in protecting their contact information from public disclosure. If their contact information were to be publicly disclosed, they may be subject to repeated inquiries from the press or members of the general public, which could rise to the level of threats or harassment, given the current media attention on Meta.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
27	795-07	<p>All text with the exception of:</p> <p>(a) Page PALM-005538382, bullet between “Immediate Impact” and “strategic apps”</p> <p>(b) Page PALM-005538382, bullet between “Long term strategic impact” and “in years”</p> <p>as highlighted in exhibit</p>	<p>This document is the performance review of an employee not named in this lawsuit. Its disclosure would publicize employee performance matters with no relevance to the case and violate the reasonable expectation that Meta would maintain the confidentiality of this information. This document also describes technical aspects of proprietary sources and methods for gathering market research. This information contains nonpublic and confidential data or research regarding app performance data, including proprietary methods for obtaining that data or conducting that research. This information has never been disclosed publicly and Meta’s product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta’s competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta.</p>
28	795-08		<p>This document details the strategy and proprietary sources and methods for gathering market research. This information contains nonpublic and confidential research regarding app performance data and competitive analysis, including proprietary methods for obtaining that data or conducting that research, and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta’s product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta’s competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta.</p>

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
29	795-10	Email addresses of Meta employees as highlighted in exhibit	This text reveals email addresses of current or former employees of Meta. These current or former employees have a legitimate, legally recognized privacy interest in protecting their contact information from public disclosure. If their contact information were to be publicly disclosed, they may be subject to repeated inquiries from the press or members of the general public, which could rise to the level of threats or harassment, given the current media attention on Meta.
30	795-16		This document describes future potential business plans and strategy with respect to header bidding. This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to Meta's advertising product and feature development. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies.
31	795-17		This document describes the negotiation of specific contract terms between Meta and Google. This text contains non-public and confidential information regarding Meta's agreements with a business partner as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give an ad venue or business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's business partners and offer specific deal terms designed to undercut those offered by Meta.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
32	795-19	¶ 17, percentage	This information reveals Meta's internal nonpublic profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight into the financial health and future outlook of Meta's product development or advertising business, which also arguably gives Meta's competitors an unfair advantage.
33	795-19	¶ 65, first sentence	This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad auction. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.
34	795-19	¶ 65, between "And the price is set by the auction" and "Q. Okay. So there"	This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad auction. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
35	795-19	n. 64, after “These ads were called “Reach and Frequency” ads.” through end of footnote	This information reveals Meta’s internal nonpublic profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta’s competitors improper insight into the financial health and future outlook of Meta’s product development or advertising business, which also arguably gives Meta’s competitors an unfair advantage.
36	795-19	page 74-75, between “PALM-007492375, p. 8.” and “(See PALM-007648629, pp. 8, 11, 21).”	This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta’s ad auction. This information has never been disclosed publicly and Meta’s product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta’s competitors in advertising.
37	795-19	p. 75, between “PALM-006846145-154, at 147” and “(See PX 666 (PALM-006077774-796, at 790))”	This information reveals Meta’s internal nonpublic profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta’s competitors improper insight into the financial health and future outlook of Meta’s product development or advertising business, which also arguably gives Meta’s competitors an unfair advantage.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
38	801-01	17:18, between “source of” and “of all advertising”	This information reveals Meta’s internal nonpublic profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta’s competitors improper insight into the financial health and future outlook of Meta’s product development or advertising business, which also arguably gives Meta’s competitors an unfair advantage.
39	801-01	17:22, between “for just” and “of advertising”	This information reveals Meta’s internal nonpublic profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta’s competitors improper insight into the financial health and future outlook of Meta’s product development or advertising business, which also arguably gives Meta’s competitors an unfair advantage.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
40	801-01	17:22, between “less than” and “of”	This information reveals Meta’s internal nonpublic profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta’s competitors improper insight into the financial health and future outlook of Meta’s product development or advertising business, which also arguably gives Meta’s competitors an unfair advantage.
41	801-01	17:25, between “with only” and “of ad spend”	This information reveals Meta’s internal nonpublic profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta’s competitors improper insight into the financial health and future outlook of Meta’s product development or advertising business, which also arguably gives Meta’s competitors an unfair advantage.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
42	801-01	17:25, between “just over” and “of advertisers”	This information reveals Meta’s internal nonpublic profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta’s competitors improper insight into the financial health and future outlook of Meta’s product development or advertising business, which also arguably gives Meta’s competitors an unfair advantage.
43	801-01	24:23-24, between “among others” and “The named plaintiffs”	This text contains confidential, non-public information regarding an advertiser and implicates their confidentiality interests, by revealing the identity of a Meta advertiser who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta’s competitors could use this non-party information to unfairly target Meta’s advertiser.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
44	801-02	85:8, between “about that” and “percent”	This information reveals Meta’s internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta’s competitors improper insight into the financial health and future outlook of Meta’s product development or advertising business, which also arguably gives Meta’s competitors an unfair advantage.
45	801-02	87:18, beginning of line until “percent”	This information reveals Meta’s internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta’s competitors improper insight into the financial health and future outlook of Meta’s product development or advertising business, which also arguably gives Meta’s competitors an unfair advantage.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
46	801-02	88:8, between “is your” and “percent”	This information reveals Meta’s internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta’s competitors improper insight into the financial health and future outlook of Meta’s product development or advertising business, which also arguably gives Meta’s competitors an unfair advantage.
47	801-02	88:11, between “the” and “percent”	This information reveals Meta’s internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta’s competitors improper insight into the financial health and future outlook of Meta’s product development or advertising business, which also arguably gives Meta’s competitors an unfair advantage.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
48	801-02	88:18-19, between “like” and “Something”	This information reveals Meta’s internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta’s competitors improper insight into the financial health and future outlook of Meta’s product development or advertising business, which also arguably gives Meta’s competitors an unfair advantage.
49	801-02	113:1-4	This text contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta’s ad auction. This information has never been disclosed publicly and Meta’s product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta’s competitors in advertising.
50	801-02	113:7-21	This text contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta’s ad auction. This information has never been disclosed publicly and Meta’s product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta’s competitors in advertising.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
51	801-02	114:20-115:4	This text contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad auction. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.
52	801-02	115:16-116:8	This text contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad auction. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.
53	801-04	¶ 2, percentage in third sentence	This text describes confidential financial information. This information reveals Meta's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight into the financial health and future outlook of Meta's product development, which also arguably gives Meta's competitors an unfair advantage.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
54	801-04	¶ 16, final sentence	This text describes confidential financial information. This information reveals Meta's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight into the financial health and future outlook of Meta's product development, which also arguably gives Meta's competitors an unfair advantage.
55	801-04	n. 15	This text describes confidential financial information. This information reveals Meta's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight into the financial health and future outlook of Meta's product development, which also arguably gives Meta's competitors an unfair advantage.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
56	801-04	¶ 22, between “targeting decreased from” and “percent”	This text describes confidential financial information. This information reveals Meta’s internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta’s competitors improper insight into the financial health and future outlook of Meta’s product development, which also arguably gives Meta’s competitors an unfair advantage.
57	801-04	¶ 22, between “beginning of the Class Period to” and “percent”	This text describes confidential financial information. This information reveals Meta’s internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta’s competitors improper insight into the financial health and future outlook of Meta’s product development, which also arguably gives Meta’s competitors an unfair advantage.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
58	801-04	Ex. III.B.1.1, percentages	This text describes confidential financial information. This information reveals Meta's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight into the financial health and future outlook of Meta's product development, which also arguably gives Meta's competitors an unfair advantage.
59	801-04	Ex. III.B.1.2	This text describes confidential financial information. This information reveals Meta's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight into the financial health and future outlook of Meta's product development, which also arguably gives Meta's competitors an unfair advantage.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
60	801-04	Ex. III.B.1.3, percentages	This text describes confidential financial information. This information reveals Meta's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight into the financial health and future outlook of Meta's product development, which also arguably gives Meta's competitors an unfair advantage.
61	801-04	¶ 24, between "During the Class Period" and "percent of ad spend"	This text describes confidential financial information. This information reveals Meta's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight into the financial health and future outlook of Meta's product development, which also arguably gives Meta's competitors an unfair advantage.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
62	801-04	¶ 24, between “During the Class Period, only” and “percent of advertisers”	This text describes confidential financial information. This information reveals Meta’s internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta’s competitors improper insight into the financial health and future outlook of Meta’s product development, which also arguably gives Meta’s competitors an unfair advantage.
63	801-04	¶ 24, between “For example, during the Class Period,” and “percent of ad spend”	This text describes confidential financial information. This information reveals Meta’s internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta’s competitors improper insight into the financial health and future outlook of Meta’s product development, which also arguably gives Meta’s competitors an unfair advantage.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
64	801-04	¶ 24, between “During the Class Period,” and “percent of the advertisers”	This text describes confidential financial information. This information reveals Meta’s internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta’s competitors improper insight into the financial health and future outlook of Meta’s product development, which also arguably gives Meta’s competitors an unfair advantage.
65	801-04	n. 24, between “Additionally,” and “of ad spend”	This text describes confidential financial information. This information reveals Meta’s internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta’s competitors improper insight into the financial health and future outlook of Meta’s product development, which also arguably gives Meta’s competitors an unfair advantage.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
66	801-04	n. 24, between “on Instagram used direct connections targeting,” and “of ad spend”	This text describes confidential financial information. This information reveals Meta’s internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta’s competitors improper insight into the financial health and future outlook of Meta’s product development, which also arguably gives Meta’s competitors an unfair advantage.
67	801-04	n. 24, between “on Messenger used direct connections targeting,” and “of ad spend on Audience Network”	This text describes confidential financial information. This information reveals Meta’s internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta’s competitors improper insight into the financial health and future outlook of Meta’s product development, which also arguably gives Meta’s competitors an unfair advantage.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
68	801-04	n. 25, between “Additionally,” and “advertisers on Instagram”	This text describes confidential financial information. This information reveals Meta’s internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta’s competitors improper insight into the financial health and future outlook of Meta’s product development, which also arguably gives Meta’s competitors an unfair advantage.
69	801-04	n. 25, between “Instagram used direct connections targeting,” and “of advertisers on Messenger”	This text describes confidential financial information. This information reveals Meta’s internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta’s competitors improper insight into the financial health and future outlook of Meta’s product development, which also arguably gives Meta’s competitors an unfair advantage.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
70	801-04	n. 25, between “Messenger used direct connections targeting, and” and “of advertisers on Audience Network”	This text describes confidential financial information. This information reveals Meta’s internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta’s competitors improper insight into the financial health and future outlook of Meta’s product development, which also arguably gives Meta’s competitors an unfair advantage.
71	801-04	n. 26, between “Additionally,” and “ad spend on Instagram”	This text describes confidential financial information. This information reveals Meta’s internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta’s competitors improper insight into the financial health and future outlook of Meta’s product development, which also arguably gives Meta’s competitors an unfair advantage.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
72	801-04	n. 26, between “Instagram used either direct connections targeting or friends of connections targeting,” and “of ad spend on Messenger”	This text describes confidential financial information. This information reveals Meta’s internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta’s competitors improper insight into the financial health and future outlook of Meta’s product development, which also arguably gives Meta’s competitors an unfair advantage.
73	801-04	n. 26, between “Messenger used either direct connections targeting or friends of connections targeting, and” and “of ad spend on Audience Network”	This text describes confidential financial information. This information reveals Meta’s internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta’s competitors improper insight into the financial health and future outlook of Meta’s product development, which also arguably gives Meta’s competitors an unfair advantage.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
74	801-04	n. 27, between “Additionally,” and “advertisers on Instagram”	This text describes confidential financial information. This information reveals Meta’s internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta’s competitors improper insight into the financial health and future outlook of Meta’s product development, which also arguably gives Meta’s competitors an unfair advantage.
75	801-04	n. 27, between “Instagram used either direct connections targeting or friends of connections targeting,” and “of advertisers on Messenger”	This text describes confidential financial information. This information reveals Meta’s internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta’s competitors improper insight into the financial health and future outlook of Meta’s product development, which also arguably gives Meta’s competitors an unfair advantage.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
76	801-04	n. 27, between “Messenger used either direct connections targeting or friends of connections targeting, and” and “of advertisers on Audience Network”	This text describes confidential financial information. This information reveals Meta’s internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta’s competitors improper insight into the financial health and future outlook of Meta’s product development, which also arguably gives Meta’s competitors an unfair advantage.
77	801-04	n. 44, between “They’re a small part of Facebook’s ad revenue, about” and “percent”	This text describes confidential financial information. This information reveals Meta’s internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta’s competitors improper insight into the financial health and future outlook of Meta’s product development, which also arguably gives Meta’s competitors an unfair advantage.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
78	801-04	Ex. IV.C.1.1	This text describes confidential financial information. This information reveals Meta's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight into the financial health and future outlook of Meta's product development, which also arguably gives Meta's competitors an unfair advantage.
79	801-04	¶ 41, between "Exhibit IV.C.1.2 shows that" and "This suggests that"	This text describes confidential financial information. This information reveals Meta's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight into the financial health and future outlook of Meta's product development, which also arguably gives Meta's competitors an unfair advantage.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
80	801-04	Ex. IV.C.1.2	This text describes confidential financial information. This information reveals Meta's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight into the financial health and future outlook of Meta's product development, which also arguably gives Meta's competitors an unfair advantage.
81	801-04	n. 84, between "They're a small part of Facebook's ad revenue, about" and "percent"	This text describes confidential financial information. This information reveals Meta's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight into the financial health and future outlook of Meta's product development, which also arguably gives Meta's competitors an unfair advantage.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
82	801-04	Ex. IV.C.4.1	This text describes confidential financial information. This information reveals Meta's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight into the financial health and future outlook of Meta's product development, which also arguably gives Meta's competitors an unfair advantage.
83	801-04	¶ 64, between "similar to a" and "where advertisers bid for each individual ad placement"	This text describes technical aspects of Meta's advertising products. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad auction. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.
84	801-04	¶ 64, between "highest 'quality' adjusted bid wins" and "Therefore,"	This text describes technical aspects of Meta's advertising products. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad auction. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
85	801-04	¶ 64, between “valuations of the impression being auctioned” and “In other words,”	This text describes technical aspects of Meta’s advertising products. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta’s ad auction. This information has never been disclosed publicly and Meta’s product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta’s competitors in advertising.
86	801-04	n. 118, between “the auction mechanism is” and “which is the minimum amount”	This text describes technical aspects of Meta’s advertising products. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta’s ad auction. This information has never been disclosed publicly and Meta’s product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta’s competitors in advertising.
87	801-04	n. 118, between “set their bid at to win the auction” and “See, for example”	This text describes technical aspects of Meta’s advertising products. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta’s ad auction. This information has never been disclosed publicly and Meta’s product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta’s competitors in advertising.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
88	801-04	¶ 65, between “in fact shared by the” and “that Meta uses”	This text describes technical aspects of Meta’s advertising products. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta’s ad auction. This information has never been disclosed publicly and Meta’s product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta’s competitors in advertising.
89	801-04	¶ 65, between “winning price in” and “such as participating”	This text describes technical aspects of Meta’s advertising products. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta’s ad auction. This information has never been disclosed publicly and Meta’s product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta’s competitors in advertising.
90	801-04	¶ 65, Exhibit VI.A.1 title, between “Meta’s” and “and Car”	This text describes technical aspects of Meta’s advertising products. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta’s ad auction. This information has never been disclosed publicly and Meta’s product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta’s competitors in advertising.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
91	801-04	¶ 65, Exhibit VI.A.1, lefthand column name, after “Meta’s”	This text describes technical aspects of Meta’s advertising products. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta’s ad auction. This information has never been disclosed publicly and Meta’s product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta’s competitors in advertising.
92	801-04	¶ 67, between “striking because” and “are ‘conceptually similar’”	This text describes technical aspects of Meta’s advertising products. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta’s ad auction. This information has never been disclosed publicly and Meta’s product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta’s competitors in advertising.
93	801-04	¶ 67, between “As such, in both a” and “and in a multilateral negotiation”	In the context in which it appears, disclosure of this information would reveal technical aspects of Meta’s advertising products. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta’s ad auction. This information has never been disclosed publicly and Meta’s product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta’s competitors in advertising.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
94	801-04	n. 123, beginning of footnote until “See also, Thomas”	In the context in which it appears, disclosure of this information would reveal technical aspects of Meta’s advertising products. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta’s ad auction. This information has never been disclosed publicly and Meta’s product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta’s competitors in advertising.
95	801-04	n. 124	In the context in which it appears, disclosure of this information would reveal technical aspects of Meta’s advertising products. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta’s ad auction. This information has never been disclosed publicly and Meta’s product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta’s competitors in advertising.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
96	801-04	¶ 69, between “specific discounts can range anywhere from” and “Meta ad credits”	This text describes confidential financial information and data, and sensitive product strategy and budget discussions. This information reflects and is calculated from internal, nonpublic Meta financial data. Meta spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Meta competitive harm by giving competitors insight into confidential Meta financial information. Further, this information reflects sensitive, highly confidential characterizations by Meta’s internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Meta to gain an unfair advantage against Meta. This text also reveals Meta’s internal nonpublic pricing information for advertising on Meta’s products or services, including how those prices can be determined. This information is not otherwise publicly reported by the company and disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public information to modify or augment their business operations in an effort to compete unfairly against Meta.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
97	801-04	¶ 69, between “In 2018, Meta budgeted” and “for ‘Overall Ad Credits’”	This text describes confidential financial information and data, and sensitive product strategy and budget discussions. This information reflects and is calculated from internal, nonpublic Meta financial data. Meta spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Meta competitive harm by giving competitors insight into confidential Meta financial information. Further, this information reflects sensitive, highly confidential characterizations by Meta’s internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Meta to gain an unfair advantage against Meta. This text also reveals Meta’s internal nonpublic pricing information for advertising on Meta’s products or services, including how those prices can be determined. This information is not otherwise publicly reported by the company and disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public information to modify or augment their business operations in an effort to compete unfairly against Meta.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
98	801-04	¶ 69, between “A portion of this” and “was earmarked”	This text describes confidential financial information and data, and sensitive product strategy and budget discussions. This information reflects and is calculated from internal, nonpublic Meta financial data. Meta spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Meta competitive harm by giving competitors insight into confidential Meta financial information. Further, this information reflects sensitive, highly confidential characterizations by Meta’s internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Meta to gain an unfair advantage against Meta. This text also reveals Meta’s internal nonpublic pricing information for advertising on Meta’s products or services, including how those prices can be determined. This information is not otherwise publicly reported by the company and disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public information to modify or augment their business operations in an effort to compete unfairly against Meta.
99	801-04	n. 125, between “range from” and “%.’)”	This information reveals Meta’s internal nonpublic pricing information for advertising on Meta’s products or services, including how those prices can be determined. This information is not otherwise publicly reported by the company and disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public information to modify or augment their business operations in an effort to compete unfairly against Meta.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
100	801-04	¶ 70, between “reached as high as” and “percent during the class period.”	This text describes confidential financial information. This information reveals Meta’s internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta’s competitors improper insight into the financial health and future outlook of Meta’s product development, which also arguably gives Meta’s competitors an unfair advantage.
101	801-04	¶ 71, between “bespoke agreements with Meta” and “Some advertisers have”	This information reveals Meta’s internal nonpublic pricing information for advertising on Meta’s products or services, including how those prices can be determined. This information is not otherwise publicly reported by the company and disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public information to modify or augment their business operations in an effort to compete unfairly against Meta.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
102	801-04	¶ 71, between “negotiated credits” and “Across these agreements.”	This text contains confidential, non-public information regarding an advertiser and implicates their confidentiality interests, by revealing the identity of a Meta advertiser who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta’s competitors could use this non-party information to unfairly target Meta’s advertiser.
103	801-04	¶ 71(a), after “magnitude of the” through end of sentence	This information reveals Meta’s internal nonpublic pricing information for advertising on Meta’s products or services, including how those prices can be determined. This information is not otherwise publicly reported by the company and disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public information to modify or augment their business operations in an effort to compete unfairly against Meta.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
104	801-04	nn. 132-136	This text contains confidential, non-public information regarding an advertiser and implicates their confidentiality interests, by revealing the identity of a Meta advertiser who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's advertiser.
105	801-06	1687:1-4, from beginning of line 1687:1 until "With this agreement in place"	This text contains confidential, non-public information regarding a non-party developer and business partner and implicates its confidentiality interests by revealing contractual terms that it has a reasonable expectation Meta will maintain the confidentiality of. It also quotes specific contract terms between Meta and that non-party business partner. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals confidential contract terms, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's business partners.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
106	801-06	1688:13-15, after “could be construed as” through end of paragraph	This text contains Meta’s confidential contractual terms. Disclosure of this confidential, non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Furthermore, if publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta’s competitors, for example by influencing how those competitors market themselves against Meta.
107	801-06	n. 6194	This document describes the negotiation of specific contract terms between Meta and Microsoft. This text contains non-public and confidential information regarding Meta’s agreements with a business partner as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta’s competitors could use this non-party information to unfairly target Meta’s business partners and offer specific deal terms designed to undercut those offered by Meta.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
108	801-06	n. 6195	This text contains confidential, non-public information regarding a non-party developer and business partner and implicates its confidentiality interests by revealing contractual terms that it has a reasonable expectation Meta will maintain the confidentiality of. It also quotes specific contract terms between Meta and that non-party business partner. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals confidential contract terms, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's business partners.
109	801-06	n. 6197	This text contains Meta's confidential contractual terms. Disclosure of this confidential, non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Furthermore, if publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors market themselves against Meta.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
110	801-07	145:20, between “few was” and “percent”	This information reflects and is calculated from internal, nonpublic Meta financial data. Meta spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Meta competitive harm by giving competitors insight into confidential Meta financial information. Further, this information reflects sensitive, highly confidential characterizations by Meta’s internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Meta to gain an unfair advantage against Meta.
111	801-07	145:20-21, between “down to” and “percent”	This information reflects and is calculated from internal, nonpublic Meta financial data. Meta spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Meta competitive harm by giving competitors insight into confidential Meta financial information. Further, this information reflects sensitive, highly confidential characterizations by Meta’s internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Meta to gain an unfair advantage against Meta.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
112	801-07	146:4, between “you know,” and “percent”	This information reflects and is calculated from internal, nonpublic Meta financial data. Meta spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Meta competitive harm by giving competitors insight into confidential Meta financial information. Further, this information reflects sensitive, highly confidential characterizations by Meta’s internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Meta to gain an unfair advantage against Meta.
113	801-07	146:5, between “percent.” and “percent is certainly few”	This information reflects and is calculated from internal, nonpublic Meta financial data. Meta spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Meta competitive harm by giving competitors insight into confidential Meta financial information. Further, this information reflects sensitive, highly confidential characterizations by Meta’s internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Meta to gain an unfair advantage against Meta.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
114	801-07	150:3, between “believe the” and “or the – I”	This text contains confidential, non-public information regarding an advertiser and implicates their confidentiality interests, by revealing the identity of a Meta advertiser who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta’s competitors could use this non-party information to unfairly target Meta’s advertiser.
115	801-07	150:4, between “cited the” and “contract”	This text contains confidential, non-public information regarding an advertiser and implicates their confidentiality interests, by revealing the identity of a Meta advertiser who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta’s competitors could use this non-party information to unfairly target Meta’s advertiser.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
116	801-11	91:16-17, between “at 0480” and “The predicate task”	This text describes confidential pricing information. This information reveals Meta’s internal non-public pricing information for advertising on Meta’s products or services, including how those prices can be determined. This information is not otherwise publicly reported by the company and disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, nonpublic information to modify or augment their business operations in an effort to compete unfairly against Meta.
117	801-11	110:10-17, between “would likely have” and “PALM-006799270”	This text reveals information about Meta’s internal risk assessments and strategies for addressing that risk. This information contains confidential, non-public information regarding Meta’s internal business strategies and analyses, including summaries and discussions of Meta’s internal modeling and assessments of its advertising platform that reveal competitively sensitive information, including how it operates, and potential improvements or other product changes. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Meta.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
118	810-03 & 813-03	n. 24, between “Dr. Tucker states:” and “ <i>Id.</i> Dr. Tucker’s”	This document describes confidential financial information. This information reveals Meta’s internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta’s competitors improper insight into the financial health and future outlook of Meta’s product development, which also arguably gives Meta’s competitors an unfair advantage.
119	810-03 & 813-03	n. 24, between “age targeting is associated with over” and “of ad spend”	This document describes confidential financial information. This information reveals Meta’s internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta’s competitors improper insight into the financial health and future outlook of Meta’s product development, which also arguably gives Meta’s competitors an unfair advantage.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
120	810-03 & 813-03	n. 24, between “geographic targeting is associated with over” and “of ad spend”	This document describes confidential financial information. This information reveals Meta’s internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta’s competitors improper insight into the financial health and future outlook of Meta’s product development, which also arguably gives Meta’s competitors an unfair advantage.
121	810-03 & 813-03	n. 24, between “There is” and “ad spend associated only with the Custom”	This document describes confidential financial information. This information reveals Meta’s internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta’s competitors improper insight into the financial health and future outlook of Meta’s product development, which also arguably gives Meta’s competitors an unfair advantage.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
122	810-03 & 813-03	¶ 30, between “associated with over” and “of ad spend, and geographic targeting”	This document describes confidential financial information. This information reveals Meta’s internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta’s competitors improper insight into the financial health and future outlook of Meta’s product development, which also arguably gives Meta’s competitors an unfair advantage.
123	810-03 & 813-03	¶ 30, between “geographic targeting was associated with over” and “of ad spend.”	This document describes confidential financial information. This information reveals Meta’s internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta’s competitors improper insight into the financial health and future outlook of Meta’s product development, which also arguably gives Meta’s competitors an unfair advantage.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
124	810-03 & 813-03	n. 26, between “Dr. Tucker states:” and “Id. Dr. Tucker’s statement is”	This document describes confidential financial information. This information reveals Meta’s internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta’s competitors improper insight into the financial health and future outlook of Meta’s product development, which also arguably gives Meta’s competitors an unfair advantage.
125	810-03 & 813-03	¶ 48, between “As shown in Figure 2 below, a” and “of change”	This information reveals Meta’s internal nonpublic profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta’s competitors improper insight into the financial health and future outlook of Meta’s product development or advertising business, which also arguably gives Meta’s competitors an unfair advantage.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
126	810-03 & 813-03	¶ 48, between “quantity of ads sold leads to a” and “change in Facebook’s capital”	This information reveals Meta’s internal nonpublic profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta’s competitors improper insight into the financial health and future outlook of Meta’s product development or advertising business, which also arguably gives Meta’s competitors an unfair advantage.
127	810-03 & 813-03	¶ 48, Figure 2	This information reveals Meta’s internal nonpublic profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta’s competitors improper insight into the financial health and future outlook of Meta’s product development or advertising business, which also arguably gives Meta’s competitors an unfair advantage.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
128	810-03 & 813-03	¶ 85, between “opposite result” and “Thus, Facebook advertisers”	This information reveals Meta’s internal nonpublic profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta’s competitors improper insight into the financial health and future outlook of Meta’s product development or advertising business, which also arguably gives Meta’s competitors an unfair advantage.
129	810-03 & 813-03	¶ 86, between “is conservative” and “(See Figures A3 and A4 in Appendix II.)”	This information reveals Meta’s internal nonpublic profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta’s competitors improper insight into the financial health and future outlook of Meta’s product development or advertising business, which also arguably gives Meta’s competitors an unfair advantage.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
130	810-03 & 813-03	¶ 87, final sentence	This information reveals Meta’s internal nonpublic profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta’s competitors improper insight into the financial health and future outlook of Meta’s product development or advertising business, which also arguably gives Meta’s competitors an unfair advantage.
131	810-03 & 813-03	n. 99, between “accounted for” and “of Facebook’s”	This information reveals Meta’s internal nonpublic profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta’s competitors improper insight into the financial health and future outlook of Meta’s product development or advertising business, which also arguably gives Meta’s competitors an unfair advantage.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
132	810-03 & 813-03	¶ 114, between “As shown in the figure, Facebook’s CTRs” and “until around 2016”	This information reveals Meta’s internal nonpublic profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta’s competitors improper insight into the financial health and future outlook of Meta’s product development or advertising business, which also arguably gives Meta’s competitors an unfair advantage.
133	810-03 & 813-03	¶ 114, between “In the Class Period, Facebook’s CTRs” and “These results”	This information reveals Meta’s internal nonpublic profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta’s competitors improper insight into the financial health and future outlook of Meta’s product development or advertising business, which also arguably gives Meta’s competitors an unfair advantage.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
134	810-03 & 813-03	¶ 114, between “Given the” and “CTRs in the Class Period”	This information reveals Meta’s internal nonpublic profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta’s competitors improper insight into the financial health and future outlook of Meta’s product development or advertising business, which also arguably gives Meta’s competitors an unfair advantage.
135	810-03 & 813-03	¶ 114, Figure 5	This information reveals Meta’s internal nonpublic profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta’s competitors improper insight into the financial health and future outlook of Meta’s product development or advertising business, which also arguably gives Meta’s competitors an unfair advantage.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
136	810-03 & 813-03	¶ 140, between “in markets where sellers use” and “this downward pressure”	This text describes technical aspects of Meta’s advertising products. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta’s ad auction. This information has never been disclosed publicly and Meta’s product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta’s competitors in advertising.
137	810-03 & 813-03	¶ 142, between “by an advertiser in the Class Period is” and “In addition”	This information reveals Meta’s internal nonpublic profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta’s competitors improper insight into the financial health and future outlook of Meta’s product development or advertising business, which also arguably gives Meta’s competitors an unfair advantage.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
138	810-03 & 813-03	¶ 142, between “In addition” and “of advertisers purchased”	This information reveals Meta’s internal nonpublic profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta’s competitors improper insight into the financial health and future outlook of Meta’s product development or advertising business, which also arguably gives Meta’s competitors an unfair advantage.
139	810-03 & 813-03	¶ 142, between “purchased at least” and “Facebook impressions in the Class Period”	This information reveals Meta’s internal nonpublic profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta’s competitors improper insight into the financial health and future outlook of Meta’s product development or advertising business, which also arguably gives Meta’s competitors an unfair advantage.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
140	810-03 & 813-03	¶ 142, between “advertiser that purchased” and “Facebook impressions purchased at least”	This information reveals Meta’s internal nonpublic profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta’s competitors improper insight into the financial health and future outlook of Meta’s product development or advertising business, which also arguably gives Meta’s competitors an unfair advantage.
141	810-03 & 813-03	¶ 146, between “affect the winning price in” and “I never stated”	This text describes technical aspects of Meta’s advertising products. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta’s ad auction. This information has never been disclosed publicly and Meta’s product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta’s competitors in advertising.
142	810-03 & 813-03	¶ 146, between “affecting prices in” and “Instead, I argued”	This text describes technical aspects of Meta’s advertising products. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta’s ad auction. This information has never been disclosed publicly and Meta’s product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta’s competitors in advertising.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
143	810-03 & 813-03	¶ 147, between “in her opinion, show that” and “and multilateral negotiations are”	In the context in which it appears, disclosure of this information would reveal technical aspects of Meta’s advertising products. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta’s ad auction. This information has never been disclosed publicly and Meta’s product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta’s competitors in advertising.
144	810-03 & 813-03	¶ 147, between “differences between auctions and negotiations” and “Yet, she fails to quote”	In the context in which it appears, disclosure of this information would reveal technical aspects of Meta’s advertising products. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta’s ad auction. This information has never been disclosed publicly and Meta’s product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta’s competitors in advertising.
145	810-03 & 813-03	¶ 147, between “stated on the same page” and “Dr. Tucker further references”	In the context in which it appears, disclosure of this information would reveal technical aspects of Meta’s advertising products. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta’s ad auction. This information has never been disclosed publicly and Meta’s product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta’s competitors in advertising.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
146	810-03 & 813-03	n. 172	In the context in which it appears, disclosure of this information would reveal technical aspects of Meta's advertising products. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad auction. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.
147	810-03 & 813-03	¶ 148, between "what I expect under Facebook's actual" and "mechanism, where no"	This text describes technical aspects of Meta's advertising products. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad auction. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.
148	810-03 & 813-03	¶ 148, between "above, under Facebook's actual" and "mechanism, the alleged monopolizing"	This text describes technical aspects of Meta's advertising products. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad auction. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
149	810-03 & 813-03	¶ 148, between “markets where sellers use” and “this upward pressure”	This text describes technical aspects of Meta’s advertising products. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta’s ad auction. This information has never been disclosed publicly and Meta’s product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta’s competitors in advertising.
150	810-03 & 813-03	¶ 149, between “dealership price negotiations and Meta’s” and “mechanism as discussed above”	This text describes technical aspects of Meta’s advertising products. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta’s ad auction. This information has never been disclosed publicly and Meta’s product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta’s competitors in advertising.
151	810-03 & 813-03	¶ 149, between “bidder’s ad and the user’ for Meta’s” and “with (2)”	This text describes technical aspects of Meta’s advertising products. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta’s ad auction. This information has never been disclosed publicly and Meta’s product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta’s competitors in advertising.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
152	810-03 & 813-03	¶ 149, between “negotiations absent from Meta’s” and “and would not be captured”	This text describes technical aspects of Meta’s advertising products. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta’s ad auction. This information has never been disclosed publicly and Meta’s product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta’s competitors in advertising.
153	810-03 & 813-03	¶ 154, between “that Meta budgeted” and “in 2018”	This document describes confidential financial information and data, and sensitive product strategy discussions. This information reflects and is calculated from internal, nonpublic Meta financial data. Meta spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Meta competitive harm by giving competitors insight into confidential Meta financial information. Further, this information reflects sensitive, highly confidential characterizations by Meta’s internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Meta to gain an unfair advantage against Meta.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
154	810-03 & 813-03	¶ 154, between “reveals that only” and “was earmarked”	This document describes confidential financial information and data, and sensitive product strategy discussions. This information reflects and is calculated from internal, nonpublic Meta financial data. Meta spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Meta competitive harm by giving competitors insight into confidential Meta financial information. Further, this information reflects sensitive, highly confidential characterizations by Meta’s internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Meta to gain an unfair advantage against Meta.
155	810-03 & 813-03	¶ 154, between “External Parties’ while” and “was allocated”	This document describes confidential financial information and data, and sensitive product strategy discussions. This information reflects and is calculated from internal, nonpublic Meta financial data. Meta spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Meta competitive harm by giving competitors insight into confidential Meta financial information. Further, this information reflects sensitive, highly confidential characterizations by Meta’s internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Meta to gain an unfair advantage against Meta.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
156	810-03 & 813-03	¶ 154, between “members were less than” and “of Meta’s advertising revenue”	This document describes confidential financial information and data, and sensitive product strategy discussions. This information reflects and is calculated from internal, nonpublic Meta financial data. Meta spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Meta competitive harm by giving competitors insight into confidential Meta financial information. Further, this information reflects sensitive, highly confidential characterizations by Meta’s internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Meta to gain an unfair advantage against Meta.
157	810-03 & 813-03	n. 191, between “stick with staying at” and “of total ad revenue”	This information reveals Meta’s internal nonpublic pricing information for advertising on Meta’s products or services, including how those prices can be determined. This information is not otherwise publicly reported by the company and disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public information to modify or augment their business operations in an effort to compete unfairly against Meta.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
158	810-03 & 813-03	¶ 155, between “reached as high as” and “percent during the class period.”	This information reveals Meta’s internal nonpublic profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta’s competitors improper insight into the financial health and future outlook of Meta’s product development or advertising business, which also arguably gives Meta’s competitors an unfair advantage.
159	810-03 & 813-03	¶ 155, between “produced by Facebook, out of” and “that purchased ads”	This information reveals Meta’s internal nonpublic profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta’s competitors improper insight into the financial health and future outlook of Meta’s product development or advertising business, which also arguably gives Meta’s competitors an unfair advantage.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
160	810-03 & 813-03	¶ 155, between “in the Class Period, just” and “of those advertisers only purchased”	This information reveals Meta’s internal nonpublic profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta’s competitors improper insight into the financial health and future outlook of Meta’s product development or advertising business, which also arguably gives Meta’s competitors an unfair advantage.
161	810-03 & 813-03	n. 195	This information reveals Meta’s internal nonpublic pricing information for advertising on Meta’s products or services, including how those prices can be determined. This information is not otherwise publicly reported by the company and disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public information to modify or augment their business operations in an effort to compete unfairly against Meta.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
162	810-03 & 813-03	Figure A1	This information reveals Meta's internal nonpublic profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight into the financial health and future outlook of Meta's product development or advertising business, which also arguably gives Meta's competitors an unfair advantage.
163	810-03 & 813-03	Figure A2	This information reveals Meta's internal nonpublic profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight into the financial health and future outlook of Meta's product development or advertising business, which also arguably gives Meta's competitors an unfair advantage.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
164	810-03 & 813-03	Figure A3	This information reveals Meta's internal nonpublic profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight into the financial health and future outlook of Meta's product development or advertising business, which also arguably gives Meta's competitors an unfair advantage.
165	810-03 & 813-03	Figure A4	This information reveals Meta's internal nonpublic profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight into the financial health and future outlook of Meta's product development or advertising business, which also arguably gives Meta's competitors an unfair advantage.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
166	810-03 & 813-03	Figure A5	This information reveals Meta's internal nonpublic profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight into the financial health and future outlook of Meta's product development or advertising business, which also arguably gives Meta's competitors an unfair advantage.
167	813-01	7:5-6, between "stating that" and "and discussing"	This information contains confidential, non-public information regarding Meta's internal business strategies and analyses, including summaries and discussions of Meta's internal assessments of its advertising platform that reveal competitively sensitive information, including how they operate, and potential product changes. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Meta.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
168	813-01	7:7, between “discussing which” and “to”	This information contains confidential, non-public information regarding Meta’s internal business strategies and analyses, including summaries and discussions of Meta’s internal assessments of its advertising platform that reveal competitively sensitive information, including how they operate, and potential product changes. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Meta.
169	813-01	7:7-8, between “to” and “Meta internally measured”	This information contains confidential, non-public information regarding Meta’s internal business strategies and analyses, including summaries and discussions of Meta’s internal assessments of its advertising platform that reveal competitively sensitive information, including how they operate, and potential product changes. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Meta.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
170	813-01	9:18-19, between “clickthrough rates and,” and “Williams Reply”	This information reveals Meta’s internal nonpublic profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta’s competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta’s competitors improper insight into the financial health and future outlook of Meta’s product development or advertising business, which also arguably gives Meta’s competitors an unfair advantage.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
171	824-03	6:16-17, between “company that” and “—a technological”	This text details the strategy and proprietary sources and methods for gathering market research. This information contains nonpublic and confidential research regarding app performance data and competitive analysis, including proprietary methods for obtaining that data or conducting that research, and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta’s product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta’s competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta’s product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta’s competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
172	824-03	6:18-19, between “like Facebook’s—” and “PALM-008758432”	This text details the strategy and proprietary sources and methods for gathering market research. This information contains nonpublic and confidential research regarding app performance data and competitive analysis, including proprietary methods for obtaining that data or conducting that research, and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta’s product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta’s competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta’s product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta’s competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
173	824-03	6:20-23, between “PALM-008758435-36.” and “ <i>Id.</i> Dr. Jakobsson”	This text details the strategy and proprietary sources and methods for gathering market research. This information contains nonpublic and confidential research regarding app performance data and competitive analysis, including proprietary methods for obtaining that data or conducting that research, and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta’s product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta’s competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta’s product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta’s competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta.

Row No.	Document	Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
174	Errata to Advertiser Class Rebuttal Report of Catherine Tucker	Language in “Original Text” and “Corrected Text” columns	This text contains confidential, non-public information regarding an advertiser and implicates their confidentiality interests, by revealing the identity of a Meta advertiser who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta’s competitors could use this non-party information to unfairly target Meta’s advertiser.

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I declare that the foregoing is true and correct under penalty of perjury.

Executed on this 14 day of August, 2024, in Menlo Park, CA.

By: Amrishi Acharya
AMRISH ACHARYA

SIGNATURE ATTESTATION

This document is being filed through the Electronic Case Filing (ECF) system by attorney Sonal N. Mehta. By her signature, Ms. Mehta attests that she has obtained concurrence in the filing of this document from the signatory.

By: /s/ Sonal N. Mehta
Sonal N. Mehta